



Minnesota Pollution Control Agency

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October 24, 2012

Mr. Tom Harmening
City Manager
City of St. Louis Park
5065 Minnetonka Boulevard
St. Louis Park, MN 55416

Mr. John Jones
Director of Regulatory Management
Vertellus Specialties, Inc.
201 North Illinois Street, Suite 1800
Indianapolis, IN 46204

RE: 2011 Progress Report on the Implementation of the Consent Decree
Reilly Tar & Chemical Superfund Site, St. Louis Park, MN

Dear Mr. Harmening and Mr. Jones:

The Minnesota Pollution Control Agency (MPCA) and the U.S. Environmental Protection Agency (EPA) received the "2011 Annual Progress Report on the Implementation of the Consent Decree" submitted on March 15, 2012 from Summit Envirosolutions on behalf of the City of St. Louis Park (City). This report is similar to Annual Progress Reports that have been prepared in past years. The following comments are given below.

Page 2-1. Regarding Part O where the report indicates that Project Leaders for the Agencies did not change in 2011, Bill Gregg's status changed in 2011 and this would be an appropriate place to restate that Bill changed to Summit Envirosolutions in 2011.

Page 3-1. Part P. Since in 2012 it was indicated that new access agreements would be required for remediation work, list what new access agreements have to be secured in 2012. Flame Industries?

Page 4-2. Identify which Mount Simon well was out of service for 2011. According to the 2011 Annual Monitoring Report SLP17 was not monitored. The consent decree says either SLP 13 or SLP 17 is to be sampled. With SLP13 not operational, SLP17 should have been sampled.

Page 4-3. As indicated in the Agencies response to the 2011 Annual Monitoring Report, W105 is to be sampled twice a year.

Page 5-1 Table 1 Section 6.1.4. The issue of biannual needs to be clarified.

Page 5-1 Table 1 Section 7.3. This section had several concerns such as monitoring W23 semi-annually, and W40 was listed for sampling despite being abandoned.

Page 5-2 Table 1 Section 9.7.2. W434 was not sampled in 2011. On the table, indicate its status for 2011.

Page 5-2 Table 1 Section 12.1.1. W403 exceed advisory levels and this table needs to be changed to reflect that.

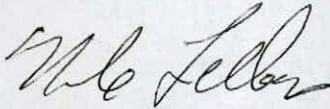
Mr. Tom Harmening and Mr. John Jones

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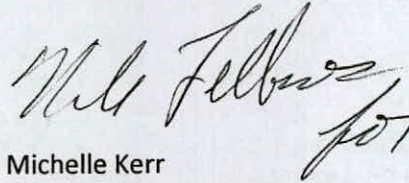
October 24, 2012

We request that you provide a revised 2011 Annual Progress Report to respond to the comments listed above. If you have any questions in this matter feel free to call Nile Fellows at 651-757-2352 or Michelle Kerr at 312-886-8961.

Sincerely,



Nile Fellows, Project Leader
Superfund Unit 1
Superfund and Emergency Response Section
Remediation Division



Michelle Kerr
Remedial Project Manager
Superfund Division
U.S. Environmental Protection Agency

NF/MK:csa